

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

ALLSTATE INSURANCE COMPANY;  
ALLSTATE FIRE AND CASUALTY  
INSURANCE COMPANY; and  
ALLSTATE PROPERTY AND  
CASUALTY INSURANCE COMPANY,

Plaintiffs,

v.

SOUTHEAST MICHIGAN SURGICAL  
HOSPITAL, LLC; J. ALAN  
ROBERTSON, M.D., P.C.; MARTIN  
QUIROGA, P.C.; COMPREHENSIVE  
NEUROMONITORING, LLC; J. ALAN  
ROBERTSON, M.D.; MARTIN  
QUIROGA, D.O.; and SIDNEY  
BRODER, M.D.,

Defendants.

C.A. No. 2:22-cv-11684-SJM-EAS

**PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE**

Plaintiffs Allstate Insurance Company, Allstate Fire and Casualty Insurance Company, and Allstate Property and Casualty Insurance Company (hereinafter collectively referred to as “Allstate” and/or “plaintiffs”) hereby respond to this Honorable Court’s Order to Show Cause (*ECF No. 19*) as follows:

On August 9, 2022, Allstate effectuated personal service on defendant Comprehensive Neuromonitoring, LLC (“Comprehensive”). *See* ECF No. 14. On

August 24, 2022, undersigned counsel for Allstate was contacted by attorney Mark R. Adams, who identified himself as retained counsel for Comprehensive. *See* Exhibit 1. Attorney Adams requested, and Allstate agreed to, an extension for Comprehensive to respond to Allstate's Complaint until October 4, 2022. *Id.* Attorney Adams also advised that Comprehensive wished to review the Eastern District of Michigan's Local Rules before determining whether to prepare a stipulation to memorialize the agreement. *Id.* Regardless of Comprehensive's position regarding submission of a stipulation, Allstate has agreed to an extension for Comprehensive's response to the Complaint to October 4, 2022 and cannot request entry of default or take any other action unless and until Comprehensive does not adhere to this new agreed-upon deadline.

Respectfully submitted,

KTM,

*/s/ Andrew H. DeNinno*

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Dated: August 31, 2022

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Andrew H. DeNinno, hereby certify that on August 31, 2022, I electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notice of such filing to all counsel of record.

KTM

*/s/ Andrew H. DeNinno*

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